

Document Log

From		To	
"Naomi T" <WQS@badriver.com>		Kathleen Mayo/R5/USEPA/US@EPA	
CC		BCC	
"Pamela Roberts" <WQSCoordinator@badriver.com>			
Subject		Date/Time	
RE: Spreadsheet to modify Great Lakes Human Health Criteria		03/09/2010 07:23 AM	

Document Body

Hi Kathy,

We noticed that in the spreadsheet you sent us the EPA's fish consumption rate of 15 g/day was broken down into 3.6 g/day for trophic level 3 fish and 11.4 g/day for trophic level 4 fish. Do you what criteria the EPA used to subdivide the 15 g/day into the different trophic levels (or where we could find the criteria)? If we decide to go with a higher fish consumption rate, how do we subdivide this rate into the different trophic levels?

Thanks for your help!

Naomi

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-----Original Message-----

From: Mayo.Kathleen@epamail.epa.gov [mailto:Mayo.Kathleen@epamail.epa.gov]
Sent: Monday, January 25, 2010 4:07 PM
To: Naomi T; Pamela Roberts
Cc: Kawakami.Cynthia@epamail.epa.gov; Wester.Barbara@epamail.epa.gov;
Norling.Francine@epamail.epa.gov
Subject: Spreadsheet to modify Great Lakes Human Health Criteria

(See attached file: GLIhhCRIT.XLS)

Hi Pam and Naomi,

I'm attaching my spreadsheet for the Great Lakes human health criteria. These are commonly modified by Tribes in the following ways:

1) Fish consumption: Tribes use their own fish consumption rates, rather than EPA's default rate. In 1995 when EPA developed the regulations for the Great Lakes basin, EPA used a 15 g/day rate within

these calculations, and the grams of fish consumed by humans was further subdivided into tier 3 and tier 4 (top predators) amounts. EPA has recently settled on a new fish consumption rate for areas outside the basin of 17.5 g/day, but has not yet updated the Great Lakes criteria. So, at a minimum, you'd only be held to having a rate of 15, but updating to at least 17.5 is a good idea. If you want higher, it should be supported by a tribal survey or research study, etc. Most of the Tribes in Region 5 use higher rates, as we discussed on the phone (32 g/day for Lac du Flambeau, 60 g/day for Fond du Lac, and 142 g/day for Grand Portage). The higher you go with the fish consumption rate, the lower (more protective) your numeric criteria will become.

2) Cancer Risk Levels: Two of the Tribes mentioned above also modify the cancer risk levels. The Great Lakes criteria use a default risk level of 1 additional cancer in 100,000 people. Fond du Lac keeps the default risk level, but Lac du Flambeau and Grand Portage have opted for a more protective cancer risk level of 1 additional cancer in 1,000,000.

If you choose to modify the criteria, there is also a requirement to notify all the Great Lakes States and Tribes. Grand Portage has done this and may have a template letter you could view. Hopefully when you chat with Margaret Watkins at Grand Portage you can ask her about the notification.

Let me know if you have any questions, or need help with the spreadsheet.
Kathy